

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

**Pshatoia LaRose
2221 Peachtree Rd. #222
Atlanta, GA 30309**

Petitioner

V.

Case No. _____

**Sean Combs
Combs Defendants
1440 Broadway Floor Frnt 3
New York, NY 10018**

Respondent

PLAINTIFFS PETITION AND COMPLAINT

COMES NOW, Petitioner Pshatoia LaRose, and states the following:

Plaintiff alleges that Respondent, Sean Combs through the entities of Combs Enterprise and Combs Global, as well as individually, committed the acts of violating the intellectual property rights of Plaintiff's phone contents and conversations, which were re-used in publications, as well as the invasion of privacy and harassment. All Defendants included in the Initial Complaint are included in this complaint. The Respondent caused harm and loss to Plaintiff both directly and indirectly through third party associations, horoscope script writings, and Respondent's brand. As a result of Respondent's actions, Petitioner has experienced severe financial loss and pain and suffering which has resulted in irreparable harm and loss to Petitioner. Plaintiff seeks damages of \$521 million.

Defendant has also violated the Lanham Act, which provides that "Any person who, on or in connection with any goods or services, or any container for goods, uses in commerce any word, term, name, symbol, or device, or any combination thereof, or any false designation of origin, false or misleading description of fact, or false or misleading representation of fact, which—(A)is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of such person with another person, or as to the origin, sponsorship, or approval of his or her goods, services, or commercial activities by another person." 15 U.S. C. § 1125(a)(1). In addition, Defendant violated Trade Secrets Act of 2016 and continuous Stalking and Invasion of Privacy of unauthorized reuse of Plaintiff's Phone Contents, Images and

Personal Property and is thus liable under the Lanham Act. Defendant has reused Plaintiff, Pshatoia LaRose contents for inspiration for both Business and Personal use ranging from Creating Products, Music Graphics, Social Media Post but not limited to only these accusations that shall result in Injunctions on these Products until Damages are awarded to Plaintiff.

Plaintiff, Pshatoia LaRose filed Domestic Violence suit against Defendant, Sean Combs prior to any Recent suits or alleged Claims against Defendant. Defendant has already made a settlement to another party, Cassandra Ventura, for similar claims to Plaintiff's, and there are other cases ongoing involving Defendant. Defendant has been in the news frequently regarding similar cases and allegations. Four women, including Ms. Ventura, have filed against Defendant for abuse and sexual assault, filing in the New York Superior Court. Combs repetitive Domestic Violence actions under further Review and Scrutiny in regards to this Case and several others shall proceed with Civil Justice by Jury Trial as well as Criminal Charges. Plaintiff, Pshatoia LaRose is stalked Daily prior to Suit and after Suit has been filed regarding Claims stated in Complaint.

Petitioner respectfully asks this Court for damages owing from Defendant's conduct be held in The United States District Court, Southern District of New York via Jury Trial, as well as for an order for Respondent to disclose all horoscope websites that he operates or is associated with, as well as for any other relief that this Court may deem proper. After further review of Appendix, This Case shall proceed and be set for a speedy Jury Trial to ensure Good Faith, Fairness, and Ethical Actions within the Judicial System to refrain continuous Stalking, Violation of Privacy, Lanham Act and Trade Secrets of 2016 by Repetitive Domestic Violence Offender, Sean Combs who shall be held accountable in the Court of Law.

Respectfully submitted,



Pshatoia LaRose
Plaintiff

Pshatoia LaRose
2221 Peachtree Rd #222
Atlanta, GA 30309
LaRose.PN@gmail.com
404-450-7210
222

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Patricia Lakose

Write the full name of each plaintiff.

CV

(Include case number if one has been assigned)

-against-

Sean Combs

Combs Defendants (please see attached)

COMPLAINT

Do you want a jury trial?

Yes No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

Combs Defendants :

Combs Enterprises
Combs Global
Sean Combs Capital
Ciroc
Deleon Tequila
Bad Boy Entertainment
Revolt Media and TV LLC
Bad Boy Records
Epic Records
Capital Preparatory Charter School
Love Records
The Sean Combs Foundation
Sean John

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

Federal Question
 Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, P. Shatia Lake,
(Plaintiff's name)

Georgia

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, SEAN CUMBS, is a citizen of the State of
(Defendant's name)

NEW YORK

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If the defendant is a corporation:

ALL DEFENDANTS / CORPORATION LISTED IN CASE EXCEPT THE Stan Cumbs FOUNDATION
The defendant, DEONTEC LLC, is incorporated under the laws of
the State of NEW YORK

and has its principal place of business in the State of NEW YORK

or is incorporated under the laws of (foreign state)

and has its principal place of business in NEW YORK.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Phatdia

First Name

N

Middle Initial

Lakose

Last Name

2221 Peachtree Rd #222

Street Address

Fulton, Atlanta

County, City

GA

State

30309

Zip Code

404.450.7210

Telephone Number

LAKOSE, PN@gmail.com

Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

First Name	SEAN	Last Name	COMBS
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Current Job Title (or other identifying information)

1440 BROADWAY FLOOR FENT 3

Current Work Address (or other address where defendant may be served)

County, City	NEW YORK, NEW YORK	State	NY
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10018

Zip Code

Defendant 2:

First Name	Bad Boy	Last Name	Entertainment
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Current Job Title (or other identifying information)

1710 BROADWAY

Current Work Address (or other address where defendant may be served)

County, City	NEW YORK, NEW YORK	State	NY
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10019

Zip Code

Defendant 3:

First Name	BPIC	Last Name	RECORDS
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Current Job Title (or other identifying information)

25 MADISON AVE

Current Work Address (or other address where defendant may be served)

County, City	NEW YORK, NEW YORK	State	NY
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10010

Zip Code

Defendant 4:

Capital Preparatory Charter School

First Name

Last Name

Current Job Title (or other identifying information)

2041 Madison Ave

Current Work Address (or other address where defendant may be served)

NEW YORK, NEW YORKNY10035

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence:

Nationwide / Virtual

Date(s) of occurrence:

2022 - Ongoing

FACTS:

(May be prior to this date as well)

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Defendant, Sean Combs, including additional Defendants are as well as others not listed on case that Defendant is associated with, owns, or is hired by has hacked and continues to hack Plaintiff, Rshatona LaRose, Electronic Devices for Business and personal use. Using unauthorized phone contents of Plaintiff, Rshatona LaRose, stalking, invasion of privacy and violation of intellectual property rights, Lethal Act and Trade Secret Act of 2010 are stated and identified in Plaintiff's Amended Complaint and Appendix attached (78 pgs.) Plaintiff, Rshatona LaRose also has witness that our conversations are monitored daily for Defendants Business use. Defendant, Sean Combs, and Defendants have rented Plaintiff, Rshatona LaRose

Phone contents are inspiration to create products, including CuzoZ Bottle Cane ways, music graphics, CD covers, music videos, social media post (not not limited to only topic mentioned above) that are sold or advertise internationally, resulting in current and future, legal, emotional distress, defamation of character, (Please see, attached Amended Complaint) and appendix for further information

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Hospitalization - 1 day - Foot Swelling, Body Scans
Nutrition, Medication and Hospital Bed Rest

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

Award Damages in the amount of \$521 million, Retaining Order against Defendant, Sean Combs and Defendants listed, along with any Third Parties not listed that Defendant owns or is paid by.

Additional Defendants Address:

Combs Enterprises 1440 Broadway Floor 3 New York, NY 10018

Stan Combs Capital

CRFC

Delon Tequila 1575 Abbot Kinney Boulevard Venice Los Angeles, CA 90291

Bad Boy Records 1710 Broadway New York, NY 10019

DOE CORPS

LIVE RECORDS

The Stan Combs Foundation 9255 W Sunset Blvd Fl 2 West Hollywood, CA 90069

Stan JMN 525 Seventh Avenue Suite 1009 New York, NY 10018

If address is left blank still researching

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IEP application.

<u>11/19/2024</u>		<u>PL</u>
Dated	Plaintiff's Signature	
<u>Phatolia</u>	<u>N</u>	<u>LaRose</u>
First Name	Middle Initial	Last Name
<u>2221 Peachtree Rd #222</u>		
Street Address	<u>GA</u>	<u>30309</u>
County, City	State	Zip Code
<u>Fulton, Atlanta</u>		
<u>407.458.7210</u>	<u>LAROSE.PN@gmail.com</u>	
Telephone Number	Email Address (if available)	

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

Yes No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.